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UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,

v.

LUIS PEREZ,  
Defendant.

**Case No. 1:21-CR-00185-JLT-BAM**

STIPULATION AND PROPOSED ORDER TO  
CONTINUE CHANGE OF PLEA HEARING

IT IS HEREBY STIPULATED by and between the parties hereto through their respective counsel, RICHARD BESHWATE, JR, attorney for Defendant LUIS PEREZ and MICHAEL TIERNEY, Assistant U.S. Attorney for Plaintiff, that the hearing currently scheduled for August 18, 2025, at 9:00 a.m. shall be continued until, November 10, 2025, at 9:00 a.m.

The defense needs additional time to prepare for the Change of Plea, specifically Mr. Perez needs additional time to enable himself an alternative to forfeiting the family's home, and the parties agree that good cause exists for the continuance. The parties stipulate and agree that the interests of justice are served by granting this continuance and outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §3161(h)(7)(A).

1 Dated: August 13, 2025

Respectfully submitted,

3 \s\ Richard A. Beshwate

4 RICHARD BESHWATE  
5 Attorney for Defendant, LUIS PEREZ

7 Dated: August 13, 2025

Respectfully submitted,

9 \s\Michael Tierney

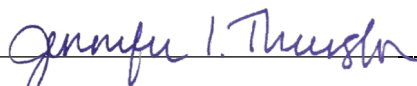
10 MICHAEL TIERNEY  
11 Assistant U.S. Attorney

12  
13 **ORDER**

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15 The Change of Plea hearing as to the above-named defendant currently scheduled for  
16 August 18, 2025, at 9:00 a.m., is continued until November 10, 2025, at 9:00 a.m. The Court finds that  
17 the interests of justice are served by granting this continuance and outweigh the best interests of the  
18 public and the defendant in a speedy trial and accordingly excludes the period from August 18 to October  
19 6 under the Speedy Trial Act. 18 U.S.C. §3161(h)(7)(A).

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22 **IT IS SO ORDERED.**

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26 Dated: August 14, 2025

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28 United States District Court Judge  
Jennifer L. Thurston